

Hickman's MCLEPC

It has come to my attention that both Hickman's facilities, 32425 W Salome Hwy, Arlington, AZ 85322 and 41625 W Indian School Rd, Tonopah, AZ 85354, are releasing ammonia and hydrogen sulfide at amounts far beyond the CERCLA 103/EPCRA 304 RQ of 100 pounds every 24-hour period. Both facilities house millions of chickens. (See <http://animalagteam.msu.edu/uploads/files/20/Region%205%20poultry%20estimator.pdf>)

There is an agricultural exemption under CERCLA 103 and EPCRA 304 for facilities with ***less than*** 30,000 laying hens or broilers, if the farm uses a liquid manure handling system or 82,000 laying hens, if the farm uses other than a liquid manure handling system. However, with millions of laying hens, Hickman's exceeds these limits, and is not exempt from reporting. (See <http://www.regulations.gov/#!documentDetail;D=EPA-HQ-SFUND-2007-0469-1358>.)

{ 40 CFR 355.31(g): (g) Any release to the air of a hazardous substance from animal waste at farms that stable or confine fewer than the numbers of animal specified in any of the following categories.

- (1) 700 mature dairy cows, whether milked or dry.
- (2) 1,000 veal calves.
- (3) 1,000 cattle other than mature dairy cows or veal calves. Cattle includes but is not limited to heifers, steers, bulls and cow/calf pairs.
- (4) 2,500 swine each weighing 55 pounds or more.
- (5) 10,000 swine each weighing less than 55 pounds.
- (6) 500 horses.
- (7) 10,000 sheep or lambs.
- (8) 55,000 turkeys.
- (9) 30,000 laying hens or broilers, if the farm uses a liquid manure handling system.
- (10) 125,000 chickens (other than laying hens), if the farm uses other than liquid manure handling system.
- (11) 82,000 laying hens, if the farm uses other than a liquid manure handling system.
- (12) 30,000 ducks (if the farm uses other than a liquid manure handling system).
- (13) 5,000 ducks (if the farm uses a liquid manure handling system). }

Further, since the majority of the money made at Hickman's comes from selling processed eggs and manufactured manure and dead chicken pellets, it is actually an industrial facility with an agricultural name.

As expressed in my letter copied to the Maricopa County LEPC in November 2015 (Attached again), there are strong ammonia odors detected at the Arlington School. An excerpt: "The ATSDR (Agency for Toxics Substances and Disease Registry) has relevant data on its website about ammonia and ammonia's health hazards, and information about how children are at a disproportionate risk. A close review of the data shows that if a person can smell ammonia, which has an odor threshold of 5 ppm, then that person is at risk. An MRL (Minimal Risk Level) of 1.7 ppm has been derived for acute-duration inhalation exposure (14 days or less) to ammonia. **An MRL of 0.1 ppm has been**

derived for chronic-duration inhalation exposure (365 days or more) to ammonia.

The ammonia odor at Arlington School that evening was very high and very irritating to human respiratory systems. ATSDR also insists that children are disproportionately affected by chemical exposures.” The children at Arlington Elementary School never escape the chronic exposure, and it is reported now that some days the levels of chemicals in the air are so high that the children are not allowed outside.

When the hydrogen sulfide that is being released from the Arlington facility and its various operations, the risk is vastly increased.

While manure and dead chickens are not processed into fertilizer pellets at the Hickman’s Tonopah facility, its other processes and operations produce far more than the 100 pound RQ for ammonia and hydrogen sulfide.

We at Don’t Waste Arizona are very concerned that there will be a health disaster at both locations due to chronic exposure to these CERCLA Hazardous Substances being released at levels far above the CERCLA 103 and EPCRA 304 RQs.

Immediate action, an emergency response, is required and needed.